

YurowitzLaw PLLC

MEMO ENDORSED

STEVEN Y. YUROWITZ

WILLIAM J. DOBIE
NAFTALI T. RABINOVICH

April 29, 2025

By ECF

Honorable Cathy Seibel
United States District Judge
United States District Court
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Moses Rabinowitz et. ano.*
23 cr 670 (CS)

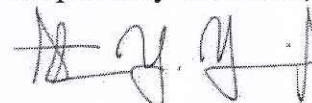
Dear Judge Seibel:

As Your Honor is aware, this firm represents Moses Rabinowitz in the above-referenced matter. I am writing to request a modification of the terms of Mr. Rabinowitz's bail conditions permitting the release of Mr. Rabinowitz's passport to him. As a condition of his release, Mr. Rabinowitz was required to surrender all travel documents. Since the surrender of his passport, Mr. Rabinowitz's passport has expired. Mr. Rabinowitz does not have a Real ID license. While Mr. Rabinowitz has no plans to travel internationally, under the terms of his bail he is permitted to travel to certain states (Michigan and Florida) for business purposes. In light of the looming May 7, 2025 effective date of the Real ID Act of 2005, Mr. Rabinowitz needs to 1) renew his passport and have it available to travel until he is able to obtain an appointment with the NJ DMV to obtain a Real ID license; and 2) ultimately use the renewed passport to obtain his Real ID license.

I have communicated with AUSA Coffman, and assuming Mr. Rabinowitz enters a guilty plea tomorrow as scheduled, the government consents to the release of Mr. Rabinowitz's passport to renew it, upon renewal to use it to obtain a REAL ID and for domestic travel until he obtains his REAL ID. Once he obtains his REAL ID, Mr. Rabinowitz will surrender back his passport to his pre-trial services officer. *

In light of the government's consent, and the desire to avoid hampering Mr. Rabinowitz's ability to earn a living, we request that the foregoing relief be granted.

Respectfully submitted,



Steven Y. Yurowitz

*Application granted
So Ordered.
Cathy Seibel
U.S.D.J.
4/30/25*

cc: AUSAs Jeffrey Coffman and Justin Brooke (by ECF)